

MM Docket 97-217

JERRY P. FRY
Superintendent June 16, 2000

Perry Public Schools

900 FIR AVENUE
PERRY, OKLAHOMA 73077-5051

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Telephone
(405) 336-4511

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Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

JUN 23 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JUN 19 2 30 PM '00

VIDEO STATION

Re: Request for Delay In MDS/ITFS Filing Window – MM Docket No. 97-217

Dear Ms. Salas:

Perry Public Schools is the licensee of Instructional Television Fixed Service ("ITFS") station WLX-845 in Stillwater, Oklahoma. We are writing to express our opposition to recent requests to postpone, for as much as nine months, the July 3-10 filing window for the submission of applications by ITFS licensees seeking to use their spectrum as part of two-way wireless broadband systems.

When the Commission adopted its 1998 Report and Order in MM Docket No. 97-217, it recognized that "the increased Internet access abilities available to ITFS licensees as a result of this rulemaking will help further the goal of providing fast, reliable and affordable Internet access to every student in the country." Perry Public Schools has revised our excess capacity leasing arrangement with a subsidiary of Nucentrix Broadband Networks, Inc. ("Nucentrix") so that we will be able to utilize the high-speed Internet access service Nucentrix is planning to launch to serve our community. We look forward to the day in the near future when our students and faculty will be able to access the Internet at broadband data rates through our relationship with Nucentrix.

We understand that while Nucentrix and its ITFS affiliates may be filing applications during the initial filing window for only a portion of the facilities Nucentrix will eventually deploy as its customer base expands, those applications that are submitted will permit Nucentrix to commence broadband operations rapidly. Thus, any postponement in the July 3-10 filing window will inevitably delay the inauguration of our high-speed Internet access capabilities. That is not only contrary to the best interests of our students and faculty, it is contrary to the best interests of our community at large. As the Commission's Report and Order acknowledged, with wireless broadband systems "consumers will be able to take advantage of new . . . distance learning and continuing education opportunities."

While those seeking a delay claim that a postponement in the long-awaited initial filing window benefits ITFS licensees, delay will inevitably cause Perry Public Schools and those who are similarly-situated irreparable harm.

For these reasons, Perry Public Schools urges the Commission to maintain its schedule for the initial filing window and thereby assure that educators, students and the public enjoy the benefits of MDS/ITFS-based wireless broadband services as quickly as possible.

No. of Copies rec'd
List A B C D E

012

Respectfully submitted,

PERRY PUBLIC SCHOOLS

By:



Larry Fry
Superintendent

cc: Roy Stewart
Chief, Mass Media Bureau
Federal Communications Commission
445 12th Street, SW
Room 2-C347
Washington, DC 20554

Barbara Kreisman
Chief, Video Services Division
Federal Communications Commission
445 12th Street, SW
Room 2-A666
Washington, DC 20554

Charles E. Dziedzic
Federal Communications Commission
445 12th Street, SW
Room 2-A864
Washington, DC 20554

MM Doc. 97-217



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JLSA CAMPUS
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Tulsa, Oklahoma 74145-1132
Tel: 918-663-9000
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"Providing quality education since 1979"

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Oklahoma City, Oklahoma 73128
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Request for Delay in MDS/ITFS Filing Window—MM Docket No. 97-217

Dear Ms. Salas:

Platt College is the licensee of Instructional Television Fixed Service ("ITFS") station WLX-397 in Tulsa, Oklahoma. We are writing to express our opposition to recent requests to postpone, for as much as nine months, the July 3-10 filing window for the submission of applications by ITFS licensees seeking to use their spectrum as part of two-way wireless broadband systems.

When the Commission adopted its 1998 Report and Order in MM Docket No. 97-217, it recognized that "the increased Internet access abilities available to ITFS licensees as a result of this rulemaking will help further the goal of providing fast, reliable and affordable Internet access to every student in the country." Platt College has revised our excess capacity leasing arrangement with a subsidiary of Nucentrix Broadband Networks, Inc. ("Nucentrix") so that we will be able to utilize the high-speed Internet access service Nucentrix is planning to launch to serve our community. We look forward to the day in the near future when our students and faculty will be able to access the Internet at broadband data rates through our relationship with Nucentrix.

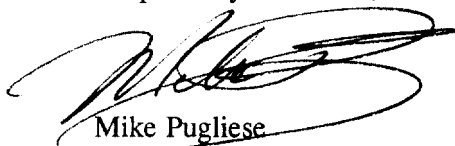
We understand that while Nucentrix and its ITFS affiliates may be filing applications during the initial filing window for only a portion of the facilities Nucentrix will eventually deploy as its customer base expands, those applications that are submitted will permit Nucentrix to commence broadband operations rapidly. Thus, any postponement in the July 3-10 filing window will inevitably delay the inauguration of our high-speed Internet access capabilities. That is not only contrary to the best interests of our students and faculty, it is contrary to the best interests of our community at large. As the Commission's Report and Order acknowledged, with wireless broadband systems "consumers will be able to take advantage of new...distance learning and continuing education opportunities."

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List A B C D E

While those seeking a delay claim that a postponement in the long-awaited initial filing window benefits ITFS licensees, delay will inevitably cause Platt College and those who are similarly situated irreparable harm.

For these reasons, Platt College urges the Commission to maintain its schedule for the initial filing window and thereby assure that educators, students and the public enjoy the benefits of MDS/ITFS-based wireless broadband services as quickly as possible.

Respectfully submitted,



Mike Pugliese
Vice-President
Platt College

cc: Roy Stewart
Chief, Mass Media Bureau
Federal Communications Commission
445 12th Street, SW
Room 2-C347
Washington, DC 20554

Barbara Kreisman
Chief, Video Services Division
Federal Communications Commission
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Charles E. Dziedzic
Federal Communications Commission
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June 17, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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JUN 23 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Request for Delay in MDS/ITFS Filing Window – MM Docket No. 97-217

Dear Ms. Salas:

Huston-Tillotson College is the licensee of Instructional Television Fixed Service (“ITFS”) station WLX-254 in Austin, Texas. We are writing to express our opposition to recent requests to postpone, for as much as nine months, the July 3-10 filing window for the submission of applications by ITFS licensees seeking to use their spectrum as part of two-way wireless broadband systems.

When the Commission adopted its 1998 Report and Order in MM Docket No. 97-217, it recognized that “the increased Internet access abilities available to ITFS licensees as a result of this rulemaking will help further the goal of providing fast, reliable and affordable Internet access to every student in the country.” Huston-Tillotson College has revised our excess capacity leasing arrangement with a subsidiary of Nucentrix Broadband Networks, Inc. (“Nucentrix”) so that we will be able to utilize the high-speed Internet access service Nucentrix is planning to launch to serve our community. We look forward to the day in the near future when our students and faculty will be able to access the Internet at broadband data rates through our relationship with Nucentrix.

We understand that while Nucentrix and its ITFS affiliates may be filing applications during the initial filing window for only a portion of the facilities Nucentrix will eventually deploy as its customer base expands, those applications that are submitted will permit Nucentrix to commence broadband operations rapidly. Thus, any postponement in the July 3-10 filing window will inevitably delay the inauguration of our high-speed Internet access capabilities. That is not only contrary to the best interests of our students and faculty, it is contrary to the best interests of our community at large. As the Commission’s Report and Order acknowledge, with wireless broadband systems “consumers will be able to take advantage of new. . . distance learning and continuing education opportunities.”

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Request for Delay in MDS/ITFS Filing Window – MM Docket No. 97-217
Huston-Tillotson College
June 17, 2000
Page 2

While those seeking a delay claim that postponement in the long-awaited initial filing window benefits ITFS licensees, delay will inevitably cause Huston-Tillotson College and those who are similarly-situated irreparable harm.

For these reasons, Huston-Tillotson College urges the Commission to maintain its schedule for the initial filing window and thereby assure that educators, students and the public enjoy the benefits of MDS/ITFS-based wireless broadband services as quickly as possible.

Respectfully submitted,

HUSTON-TILLOTSON COLLEGE



Terry S. Smith
Executive Vice President

cc: Roy Stewart
Chief, Mass Media Bureau
Federal Communications Commission
445 12th Street, SW
Room 2-C347
Washington, DC 20554

Barbara Kreisman
Chief, Video Services Division
Federal Communications Commission
445 12th Street, SW
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Charles E. Dziedzic
Chief, Video Services Division
Federal Communications Commission
445 12th Street, SW
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Washington, DC 20554

REGION

EDUCATION SERVICE CENTER

XIII

June 16, 2000

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JUN 23 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Request for Delay In MDS/ITFS Filing Window – MM Docket No. 97-217

Dear Ms. Salas:

Education Service Center Region XIII is the licensee of Instructional Television Fixed Service ("ITFS") station WLX-271 in Austin, Texas. We are writing to express our opposition to recent requests to postpone, for as much as nine months, the July 3-10 filing window for the submission of applications by ITFS licensees seeking to use their spectrum as part of two-way wireless broadband systems.

When the Commission adopted its 1998 Report and Order in MM Docket No. 97-217, it recognized that "the increased Internet access abilities available to ITFS licensees as a result of this rulemaking will help further the goal of providing fast, reliable and affordable Internet access to every student in the country." Education Service Center Region XIII has revised our excess capacity leasing arrangement with a subsidiary of Nucentrix Broadband Networks, Inc. ("Nucentrix") so that we will be able to utilize the high-speed Internet access service Nucentrix is planning to launch to serve our community. We look forward to the day in the near future when our students and faculty will be able to access the Internet at broadband data rates through our relationship with Nucentrix.

We understand that while Nucentrix and its ITFS affiliates may be filing applications during the initial filing window for only a portion of the facilities Nucentrix will eventually deploy as its customer base expands, those applications that are submitted will permit Nucentrix to commence broadband operations rapidly. Thus, any postponement in the July 3-10 filing window will inevitably delay the inauguration of our high-speed Internet access capabilities. That is not only contrary to the best interests of our students and faculty, it is contrary to the best interests of our community at large. As the Commission's Report and Order acknowledged, with wireless broadband systems "consumers will be able to take advantage of new . . . distance learning and continuing education opportunities."

While those seeking a delay claim that a postponement in the long-awaited initial filing window benefits ITFS licensees, delay will inevitably cause Education Service Center Region XIII and those who are similarly-situated irreparable harm.

For these reasons, Education Service Center XIII urges the Commission to maintain its schedule for the initial filing window and thereby assure that educators, students and the public enjoy the benefits of MDS/ITFS-based wireless broadband services as quickly as possible.

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Respectfully submitted,

EDUCATION SERVICE CENTER REGION XIII

By: 
Dr. Luke Martin

cc: Roy Stewart
Chief, Mass Media Bureau
Federal Communications Commission
445 12th Street, SW
Room 2-C347
Washington, DC 20554

Barbara Kreisman
Chief, Video Services Division
Federal Communications Commission
445 12th Street, SW
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445 12th Street, SW
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GREENE COUNTY SCHOOL DISTRICT, R-8

Logan-Rogersville

Doug Hayter, Ed.S.
Superintendent

E-Mail: dhayter@lrhs.greene-r8.k12.mo.us

Gary Hogue, Ed.S.
Asst. Superintendent

ghogue@lrhs.greene-r8.k12.mo.us

June 16, 2000

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J.D. Fielden, Vice President
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Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Request for Delay In MDS/ITFS Filing Window – MM Docket No. 97-217

Dear Ms. Salas:

Green County R-8 School District is the licensee of Instructional Television Fixed Service ("ITFS") station WNC-384 in Springfield, Missouri. We are writing to express our opposition to recent requests to postpone, for as much as nine months, the July 3-10 filing window for the submission of applications by ITFS licensees seeking to use their spectrum as part of two-way wireless broadband systems.

When the Commission adopted its 1998 Report and Order in MM Docket No. 97-217, it recognized that "the increased Internet access abilities available to ITFS licensees as a result of this rulemaking will help further the goal of providing fast, reliable and affordable Internet access to every student in the country." Green County R-8 School District has revised our excess capacity leasing arrangement with a subsidiary of Nucentrix Broadband Networks, Inc. ("Nucentrix") so that we will be able to utilize the high-speed Internet access service Nucentrix is planning to launch to serve our community. We look forward to the day in the near future when our students and faculty will be able to access the Internet at broadband data rates through our relationship with Nucentrix.

We understand that while Nucentrix and its ITFS affiliates may be filing applications during the initial filing window for only a portion of the facilities Nucentrix will eventually deploy as its customer base expands, those applications that are submitted will permit Nucentrix to commence broadband operations rapidly. Thus, any postponement in the July 3-10 filing window will inevitably delay the inauguration of our high-speed Internet access capabilities. That is not only contrary to the best interests of our students and faculty, it is contrary to the best interests of our community at large. As the Commission's Report and Order acknowledged, with wireless broadband systems "consumers will be able to take advantage of new . . . distance learning and continuing education opportunities."

While those seeking a delay claim that a postponement in the long-awaited initial filing window benefits ITFS licensees, delay will inevitably cause Green County R-8 School District and those who are similarly-situated irreparable harm.


For these reasons, Green County R-8 School District urges the Commission to maintain its schedule for the initial filing window and thereby assure that educators, students and the public enjoy the benefits of MDS/ITFS-based wireless broadband services as quickly as possible.

104 Beatie Street Rogersville, MO 65742
Phone 417 753-2891 Fax 417 753-3063
Website: <http://www.oznet.com/rogersville>

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Respectfully submitted.

GREEN COUNTY R-8 SCHOOL DISTRICT

By: 
Doug Hayter
Superintendent

cc: Roy Stewart
Chief, Mass Media Bureau
Federal Communications Commission
445 12th Street, SW
Room 2-C347
Washington, DC 20554

Barbara Kreisman
Chief, Video Services Division
Federal Communications Commission
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Federal Communications Commission
445 12th Street, SW
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VEGA.COMM. INC.

P.O. Box 781123
Orlando, Florida 32878-1123
Phone: (407) 415-0931 • Fax: (407) 207-5925
Email: vegacomm@vegacomm.com

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JUN 23 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 14, 2000

Via Federal Express

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

ATTN: Chief, Mass Media Bureau

RE: Comments to FCC Public Notice, DA 00-1256, regarding Petitions to Postpone
Initial Filing Window For Two-Way MDS and ITFS systems.

Dear Ms. Salas:

Pursuant to the above-referenced Public Notice, dated June 12, 2000, submitted
herewith, in an original and four (4) copies, are comments in support of a temporary
postponement of the initial filing window for two-way MDS and ITFS applications.

Should the Commission have any questions concerning these matters, please contact
the undersigned.

Sincerely,


Richard L. Vega, Jr.
President

✓ Cc: David Roberts, Video Services Division

Encl.

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List A B C D E

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the matter of)	
)	
Petitions to Postpone Initial Filing Window)	Public Notice
For Two-Way MDS and ITFS Stations)	DA 00-1256
filed by ITFS 2020, L.L.C. and The)	
Association of Federal Communications)	
Consulting Engineers)	
)	

To the Chief, Mass Media Bureau:

**COMMENTS IN SUPPORT OF PETITIONS
TO POSTPONE INITIAL FILING WINDOW
FOR TWO-WAY MDS AND ITFS STATIONS**

VEGA.COMM.INC., ("VEGA"), a telecommunications engineering consulting firm located in Orlando, Florida, supports the Petitioners' request to postpone the initial filing window for Two-Way MDS and ITFS stations for the reasons stated below.

VEGA, through its president, Richard Vega, Jr., has been involved in the MDS and ITFS industry for over 20 years.¹ During this period VEGA has provided numerous entities with technical support services relating to Federal Communication Commission ("FCC") licensing matters. VEGA has been retained to provide technical support services to companies and other organizations to partake in the Two-Way proceeding.

¹ VEGA is the successor company to Phase One Communications, Inc. Prior to the formation of Phase One, Richard Vega, Jr., was a member of the consulting firm Vega and Associates whose founder, Richard Vega Sr., was a pioneer of Wireless Cable Services.

These services include the preparation of interference studies compliant with FCC Report and Order, MM Docket No. 97-217, released September 25, 1998, (“Order”) and its associated Appendix D, (“Appendix D”).²

BACKGROUND

On June 6, 2000, ITFS 2020, LLC., (“2020”), filed an Emergency Petition to the FCC requesting a nine (9) month postponement of the initial filing window. On June 7, 2000, The Association of Federal Communications Consulting Engineers (“AFCCE”), filed its Petition requesting an additional 130 days before the FCC begins accepting applications for Two-Way MDS and/or ITFS service.

Each Petition raises significant issues relative to the ability to complete viable Two-Way applications in a timely manner. The common issue found in both the 2020 and AFCCE (collectively referred to as “Petitioners”) Petition’s is the lack of, and expertise in the use of, reliable and compatible software required to comply with the complex issues outlined in Appendix D. The Petitioners also point out that the process of accessing accurate application data from the FCC files has been slow and cumbersome which also becomes a factor in delaying the preparation process beyond expectations. Additionally, the 2020 Petition, among other things, states “...in order to maximize...” an operators ability to partake in the transformation of the nation’s first wireless two-way multimedia opportunity, “...licensees must file in the first filing window”. A statement to which VEGA agrees.

² Appendix D of the Order provides the methodology for predicting interference to and from stations

SUPPORTING COMMENTS

VEGA supports a postponement of the initial two-way filing for each of the reasons cited by the Petitioners as explained further below:

- Software Availability/Compatibility: VEGA agrees with the Petitioners to the extent that the commercial software has not been available long enough to adequately verify the authenticity of the study results. Moreover, VEGA agrees that there is sufficient evidence to suggest that initial use and performance of the software may produce unreliable results.³ Additionally, as pointed out by AFCCE, if study results are not readable by one program version verses another, delays will be experienced when attempting to comply with the second phase (cooperative elimination of interference) and third phase (Petition to Deny) of the filing window process. Since the process of completing and reviewing applications proposing two-way service rests on the shoulders of the MDS and ITFS licensees, compatibility between each program must be resolved before the FCC can move ahead with the first window.
- Access to reliable application data: The FCC is relying extensively on the industry to “police” itself in the preparation of interference studies and the elimination of interference, if necessary, during the transformation process. To complete an analysis of the potential for harmful interference, an applicant is generally required to retain the FCC copy contractors to extract the files required to complete the study prior to submittal.

operating in a Two-Way format. Appendix D was amended on April 27, 2000.

³ This occurrence is most likely being caused, not by the software, but by the lack of software familiarity.

Within the last two (2) weeks the FCC went online with its database of MDS and ITFS stations to help the process of obtaining information for an applicant to conduct the required interference study. However, the ability to process the data is difficult since there is no documentation to aid in the manipulation of the data.

Hence, the online database, as it exists now, is useless for extracting information required during the initial filing window. As such, an applicant must continue extracting pertinent application data directly from the FCC files to which access is limited.

- *Licensees must be encouraged to file:* VEGA supports 2020's position regarding the need to maximize a licensee's opportunity to file during the initial filing period. VEGA believes that, without a temporary delay, the majority of applications submitted during the initial window will be "foot-in-the-door" configurations that are not likely to evolve into actual two-way networks. Rather, these temporary configurations will provide nothing more than a leg-up opportunity for a few carriers willing to file without regard to sincere engineering design. This is an important consideration since never before has a radical change in spectrum usage so greatly affected stations within the same market. Historically, when an industry evolves into a different technology the only affected territory is the adjacent market territory where coordination becomes significantly less burdensome or, as in the case of Digital Television ("DTV"), the FCC played the roll of spectrum manager to help ease the burden of technology transformation on incumbent operations.⁴

⁴ By example, as the cellular industry upgrades to new digital technologies, there are virtually no affects on adjacent-channel carriers in the same market or co-channel carriers in an adjacent market. Conversely,


Under the two-way digital evolution, carriers within the same geographical area would be greatly affected and their decision not to file during the initial filing window could gravely reduce opportunities in the future.⁵

CONCLUSION

Notwithstanding the above, given the short notice on the initial filing window, the late released amendment to Appendix D, the recent release of the requisite filing form (Form 331), combined with the software issues should be compelling enough to warrant a short delay in the initial filing window.

VEGA hereby respectfully requests that the FCC grant the Petitions and postpone the initial filing window until, at a minimum, six (6) months from July 1, 2000. A temporary postponement will help ensure; (1) a smooth transformation for carriers to convert to Two-Way operations; (2) correct usage and expertise in the use of software will be accomplished, as supported by AFCCE, and; (3) that all carriers desirous of filing are afforded the opportunity to partake in the initial filing window rather than subsequent windows. These considerations would greatly further the Public's Interest.

Respectfully,



Richard L. Vega, Jr. President
VEGA.COMM.INC.
P.O. Box 781123
Orlando, Florida 32878-1123

June 14, 2000

since DTV allocation had such a radical affect on incumbent operators in the same market, the FCC acted as spectrum managers to ensure a smooth transition. The DTV transitional process took significantly longer than being afforded the MDS and ITFS community.

⁵ See paragraph II of 2020's Emergency Petition.

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JUN 23 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 17, 2000
Office of the Secretary,
Magalie Roman Salas,
Federal Communications Commission,
445 Twelfth Street, S.W., Room TW-A325,
Washington, DC 20554

Comments Re: Public Notice
DA 00-1256, June 12, 2000
Re: Santa Barbara, Ca E1-E4 & H1-H3

JUN 19 2 35 PM '00

VIDEO SERVICES

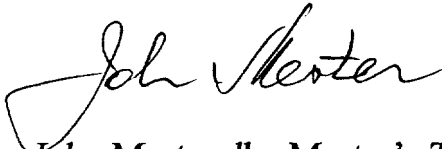
Dear Mis Salas:

The undersigned petitioner hereby requests at least a 90 day extension of the July 3 through July 10, 2000 filing window MDS and ITFS applications. The initial notice released by the Commission simply does not allow enough time all available engineering firms to render its services to all licensees.

We have contacted several firms to no avail. To grant an equal opportunity for all to file is only fair and in certainly is in public interest.

Hoping you and Commission will give this and all other licensees your fullest consideration and attention. All engineering firms we contacted were not able to offer service because of overbooking. We were also informed that those who shall have their licenses granted will gain an unfair advantage over those who were not able to file in the same market.

Thank You,



John Mester dba Mester's TV
cc: David Roberts, Video Svcs
Marissa G. Repp, Hogan & Hartson

No. of Copies rec'd
List A B C D E

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